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11 RICHARD A. MARSHACK

12 In re
13 NORTHERN HOLDING, LLC,
14 Debtor.

15 Case No. 8:20-bk-13014-ES

16 Chapter 7

17 SECOND STIPULATION RE:
18 EXTENSION OF TIME FOR
19 RESPONSIVE PLEADING FROM
20 LEROY “LEE” CODDING TO MOTION
21 FOR ISSUANCE OF ORDER TO SHOW
22 CAUSE RE: CIVIL CONTEMPT
23 [MOTION DOCKET NO. 304]
24 [NO HEARING REQUIRED]

25 TO THE HONORABLE ERITHE A. SMITH, UNITED STATES BANKRUPTCY JUDGE, THE
26 OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

27 This stipulation is entered into between Richard A. Marshack, in his capacity as Chapter 7
28 Trustee (“Trustee”) of the Bankruptcy Estate (“Estate”) of Northern Holding, LLC (“Debtor”), and
Leroy “Lee” Codding (“Mr. Codding”) (together, the “Parties”), through undersigned counsel,
regarding an extension of Mr. Codding’s deadline to file a response to Trustee’s motion for issuance
of an order to show cause re: civil contempt filed on April 1, 2022, as Docket No. 304.

29 **Recitals**

30 A. On April 1, 2022, as Dk. No. 304, Trustee filed a motion for issuance of an order to
31 show cause re: civil contempt against Mr. Codding (“Motion”). Under Local Bankruptcy Rule 9020-
1(d), Mr. Codding had a seven-day period to file a response to the Motion.

B. On April 5, 2022, as Dk. No. 308, the Parties filed a stipulation to extend Mr. Codding's response deadline from April 8, 2022 to April 20, 2022 ("Extension Stipulation").

3 C. On April 8, 2022, as Dk. No. 313, the Court entered an order approving the Extension
4 Stipulation.

5 The Parties agree and STIPULATE as follows:

6 1. Mr. Codding shall have a further extended period to file a response or opposition to
7 the Motion, through and including May 11, 2022, without prejudice to further stipulated extensions.

8 2. The Parties jointly request that no order be entered on the Motion prior to May 11,
9 2022.

10 3. This stipulation may be executed in one or more counterparts and facsimile or
11 electronic signatures may be used in filing this document with the Court.

13 | Dated: April 19, 2022

MARSHACK HAYS LLP

By: _____ /s/ Tinho Mang

D. EDWARD HAYS
TINHO MANG
Attorneys for Chapter 7 Trustee
RICHARD A. MARSHACK

Dated: April 19, 2022

GOE FORSYTHE & HODGES LLP

By: ROBERT P. GOE
BRANDON J. ISKANDER
Attorneys for Respondent
LEROY "LEE" CODDING

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: **SECOND STIPULATION RE: EXTENSION OF TIME FOR RESPONSIVE PLEADING FROM LEROY "LEE" CODDING TO MOTION FOR ISSUANCE OF ORDER TO SHOW CAUSE RE: CIVIL CONTEMPT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On April 19, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On April 19, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

NORTHERN HOLDING, LLC
ATTN: OFFICER, A MANAGING OR GENERAL AGENT,
OR TO ANY OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE SERVICE
13217 JAMBOREE RD #429
TUSTIN, CA 92782

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on April 19, 2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PURSUANT TO COURTROOM POLICIES AND PROCEDURES OF HONORABLE ERITHE A. SMITH, COURTROOM 5A, § VIII. JUDGES' OR COURTESY COPIES, EXCEPT FOR DOCUMENTS 200 PAGES OR OVER, INCLUDING EXHIBITS, JUDGE SMITH DOES NOT REQUIRE JUDGES' COPIES.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 19, 2022
Date

Layla Buchanan
Printed Name

/s/ Layla Buchanan
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:**

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